

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT NEW YORK**

-----X

JANE DOE 43,

17-cv-00616-JGK

Plaintiff,

vs.

JEFFREY EPSTEIN, GHISLAINE
MAXWELL, SARAH KELLEN, LESLEY
GROFF, AND NATALYA MALYSHEV,

Defendant.

-----X

DEFENDANT SARAH KELLEN'S NOTICE OF MOTION TO DISMISS

PLEASE TAKE NOTICE that upon the annexed Memorandum of Law, and the accompanying Declaration of John E. Stephenson in support of Sarah Kellen's Motion to Dismiss, dated November 21, 2017, and the exhibits attached thereto, and in accordance with the schedule entered by this Court, Defendant Sarah Kellen, by and through her counsel, Alston & Bird LLP, will move this Court at the United States Courthouse, 500 Pearl Street, New York, New York, at the earliest available time, for an Order pursuant to Rule 12 of the Federal Rules of Civil Procedure dismissing the claims asserted against her in the Amended Complaint with prejudice.

Dated: Atlanta, Georgia
November 21, 2017

By: /s/John E. Stephenson, Jr.
John E. Stephenson, Jr.
(admitted pro hac vice)
Jonathan D. Parente
(pro hac vice forthcoming)
ALSTON & BIRD LLP
1201 West Peachtree Street
Atlanta, Georgia 30309
(404) 881-7000
john.stephenson@alston.com
jonathan.parente@alston.com

Alexander S. Lorenzo
ALSTON & BIRD LLP
90 Park Avenue
New York, New York 10016
(212) 210-9400
alexander.lorenzo@alston.com

Counsel for Defendant
Sarah Kellen

To: Counsel of Record for All Parties